### HOUSING AND COMMUNITY DEVELOPMENT PROGRAMS

# 2007 CONSOLIDATED ANNUAL PERFORMANCE REPORT REPORTING PERIOD APRIL 1, 2007 THROUGH MARCH 31, 2008





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#### **Executive Summary**

In compliance with U.S. Department of Housing and Urban Development (HUD) regulations, the State of Idaho developed and implemented a Five Year Strategic Plan, effective April 1, 2005 through March 31, 2010. The Strategic Plan is a planning document to coordinate Idaho's housing and community development needs with the strategic planning the State of Idaho will use to meet these goals. The Consolidated Plan is Idaho's annual report to HUD regarding its progress using the annual, formula-based funding allocations for the CDBG, HOME, and ESG programs. Idaho's Strategic Plan is the single document through which HUD funds are approved for Idaho's non-entitlement areas.

The Idaho Department of Commerce is the grantee and administrator of the CDBG funds. Idaho Housing and Finance Association is the grantee and administrator of the HOME and ESG program and funds.

\*In regard to the CAPER, CDBG funding does not impact Idaho's seven entitlement communities: Boise, Coeur d'Alene, Idaho Falls, Meridian, Pocatello, Lewiston, and Nampa. Each community receives direct funds from HUD.

\*With notable exceptions, IHFA serves those counties and communities not submitting their own Action Plan.

The Consolidated Annual Performance Report (CAPER) is the annual report; and update and review of the goals and strategies set forth by the State of Idaho in its Five-Year Strategic Plan. The CAPER includes:

- summary of resources and distribution of funds
- an assessment of 5-year goals and strategies
- actions to affirmatively furthering fair housing
- affordable housing objectives
- progress on the Plan's other actions
- leveraging resources data
- citizen comments
- self evaluation
- explanation of program monitoring process
- specific federal program information

Idaho Housing and Finance and Idaho Department of Commerce will work with state and local stakeholders to create and support suitable living environment, safe, decent housing and economic for opportunities for people of places of Idaho with the greatest need.

#### Goal 1: Increase access to decent affordable housing

- Sustain and increase homeownership
- Sustain and increase affordable rental housing
- Support access to a continuum of housing services

#### **Goal 2: Preserve and enhanced suitable living environments**

- *Improve safety and livability of communities*
- Increase access to quality facilities and services
- Improve affordability and sustainability of quality facilities and services

#### **Goal 3: Expand economic opportunities**

- Create jobs primarily for low- and moderate-income persons
- Prioritize projects that provide a living wage and fringe benefits
- Revitalize downtown business districts

#### Goal 4: Increase community investment and involvement

- Promote effective partnerships
- Support efforts to increase local capacity in planning, administration, and implementation.

#### **CDBG**

Idaho Department of Commerce received \$8,978,224 for PY 2007. The department obligated \$7,914,849 to CDBG projects and activities. Idaho communities throughout the state leveraged \$154,365,183 to match CDBG funds awarded.

IDC awarded 22 Idaho Community Development Block Grants throughout the state during PY 2007. Sixteen projects received funding under the goal *Preserve and Enhance Suitable Living Environments*, and six projects were funded under the goal *Expand Economic Opportunities*. In addition to grant awards, IDC will fund four activities under the goal *Increase Community Investment and Involvement*.

#### **HOME**

Idaho Housing and Finance received \$5,808,800 in HOME and ADDI funds for PY 2007. With program income and prior year carry-over, the total amount of resources available for 2007 was \$14,172,969. IHFA committed and spent \$6,136,833 towards projects and administration, leaving an unexpended balance of \$1,530,339 at the end of the 2007 program year.

IHFA awarded HOME funds to 17 projects throughout the state during PY 2007. Projects ranged from down payment assistance programs to Mutual Self-Help homeownership to multifamily rental projects. All of which successfully contributed toward the state's goals of increasing access to affordable housing, preserving and enhancing suitable living environments, and increasing community investment and involvement.

#### **ESG**

Idaho Housing and Finance received \$ 525,763 in Emergency Shelter Grant funds for PY 2007. Combined with the prior year's unexpended balance of \$286,257, the total amount of resources available for PY 2007 was \$816,020. IHFA disbursed \$528,911 towards projects and administration, leaving an unexpended balance of \$267,109 at the end of the 2007 program year. IHFA awarded ESG funds to 16 homeless shelters statewide in an effort to improve quality, meet operating costs, and provide essential services to homeless individuals. Four of these agencies also received homeless prevention funds included in their ESG award. Three additional non-profit agencies received ESG awards for homeless prevention activities only. One 2007 project

sponsor is a first time recipient of ESG funds and is utilizing the award to provide housing and services to victims of domestic violence in a rural community.

#### **Summary of Resources and Distribution of Funds**

This section provides a financial overview of the State of Idaho's CDBG and HOME program including the amount received for each program during PY2007, how much funding was awarded and expended during the reporting period, and where those funds were spent in the state.

The state participating jurisdiction (PJ) includes the entire State of Idaho, excluding the City of Boise, which has both CDBG and HOME PJ status, and the cities of Pocatello, Nampa, Meridian, Coeur d'Alene, Lewiston, and Idaho Falls, which have CDBG PJ status. Neither IHFA nor IDC allocate funds based on geography. Both follow competitive application processes and allocate funds based on demonstrated need, sustainability of projects funded and the strength of individual applications.

#### CDBG:

 2007 HUD CDBG Award:
 \$8,978,224

 \* 2006 Carryover:
 \$1,707,616

 Total:
 \$10,685,840

State Admin: \$279,564 **Total Available to Fund Projects & Activities:** \$10,406,276 **Total Awarded:** \$7,914,849

\*Carryover consists of unobligated 2006 funds and any reversions received during PY2006. The State of Idaho does not award ICDBG grants on a geographic basis. All cities and counties are eligible to compete in the competitive grant application process outlined in the *ICDBG Application Handbook*. The following is a summary of the 2007 project awards based upon Idaho's six regional areas.

Region	Amount Awarded	Percent
I	\$1,335,000	17%
II	\$565,500	7%
III	\$1,132,449	14%
IV	\$3,411,900	43%
V	\$600,000	7%
VI	\$870,000	11%
State-wide TA	\$89,782	1%
Total	\$7,914,849	100%

The following maps provide information regarding regional distribution by project types. Public facility, senior center, community center, and imminent threat projects can be found on the first map, and economic development and downtown revitalization projects can be found on the second map.

#### Idaho Community Development Block Grants (ICDBG) Public Facilities, Imminent Threat and Community/Senior Centers



### Idaho Community Development Block Grants (ICDBG) Economic Development and Downtown Revitalizations



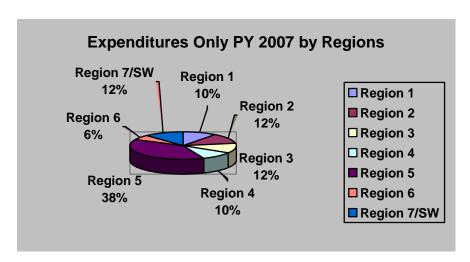
#### **HOME Financial Summary:**

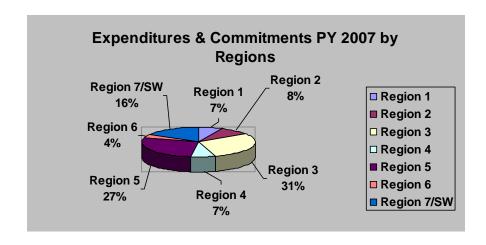
UNEXPENDED HOME FUNDS PRIOR PROGRAM YEAR END: \$ 7,667,172 HOME 2006 ALLOCATION: \$ 5,732,588 ADDI 2006 ALLOCATION: \$ 76,242 PROGRAM INCOME: \$ 696,967

#### TOTAL RESOURCES AVAILABLE:

\$ 14,172,969

The following chart displays the geographic breakdown of total HOME funds committed and spent throughout the state:

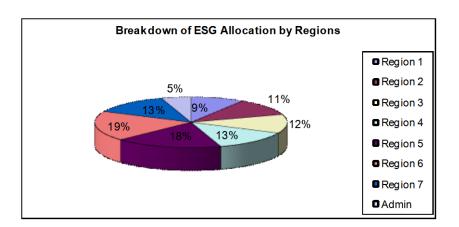




#### **ESG Financial Summary:**

UNEXPENDED 2006 ESG ALLOCATION: \$ 286,025 2007 ESG ALLOCATION: \$ 529,763 TOTAL RESOURCES AVAILABLE: \$ 816,020

ESG FUNDS DISBURSED FROM 2006 ALLOCATION:	\$ 249,207
ESG FUNDS DISBURSED FROM 2007 ALLOCATION:	\$ 253,579
ADMINISTRATION:	\$ 26,125
TOTAL DISBURSEMENTS:	\$ 528,911
UNEXPENDED BALANCE:	\$ 267,109



#### **General CAPER Narrative**

This section describes the accomplishments the State of Idaho's CDBG and HOME programs have made towards achieving its 5-year goals and strategies including an assessment of what progress has been made, how funds were spent, and, if applicable, why certain goals are not being met.

#### **CDBG**

During PY2007, Idaho Department of Commerce funded projects that fall under three of the State's 5-year goals.

#### Preserve and Enhance Suitable Living Environments

\$2,655,049 of CDBG funds were awarded to eight projects that will improve the safety and livability of Idaho's Communities. 22,164 Idaho residents will benefit from projects that will bring their systems into regulatory compliance with federal and state rules, which will resolve compliance or consent orders and building codes. The eight projects consist of four water systems, three sewer systems, and one community center.

\$1,810,000 of CDBG funds were awarded to five projects that will increase access to quality facilities and services. 14,973 Idaho residents will benefit from projects that will construct a new system or facility in their service area. The projects consist of two new sewer treatment plants, one new fire station, one new storm water drainage system, and final construction phase of a new community center.

\$1,400,000 of CDBG funds were awarded to three projects to improve affordability and sustainability of quality facilities and services. 5,736 Idaho citizens will benefit from the

replacement or rehabilitation of their infrastructure or public facilities. The projects consist of one water system and two sewer systems. See Exhibit M

#### Expand Economic Opportunities

\$1,150,000 of CDBG funds were awarded to four projects that will create jobs for low- to moderate-income persons. The funds were invested in publicly owned infrastructure and facilities to assist communities with attracting a new business or retaining an existing business. As a result, participating businesses pledged to create or retain 194 jobs, and at least 51% of those will be held by low- to moderate-income individuals. Two businesses prioritized paying a living wage and fringe benefits.

\$899,800 of CDBG funds were awarded to two communities to revitalize their downtown business districts. The funds will improve sub-standard infrastructure services and encourage renewed business development. 19,071 citizens will have access to a downtown area conducive to increased economic growth. See Exhibit N.

#### Increase Community Investment and Involvement

Idaho Department of Commerce uses its 1% set aside of technical assistance funds, to provide training and technical assistance, project development, capacity building and affirmatively furthering fair housing.

\$39,727 has been set aside to provide state technical assistance to certified grant administrators and communities. The funds are used to provide technical assistance during project development and monitoring visits.

\$20,000 has been set-aside for Application Workshops and Grant Administration Certification training. The workshops are held throughout the state and allow community leaders, members of civic and development organizations, and grant administrators, to learn about the CDBG program, how to access funds, how the funds can be used, and what obligations come with a grant award.

\$15,000 has been set aside for Fair Housing activities. The funds are used by the State and Grantees to Affirmatively Further Fair Housing and provide educational and informational materials.

\$15,000 has been committed to the annual Northwest Community Development Institute Conference. The conference brings together local elected officials and their staff to receive training in, community and economic development issues as well as providing an opportunity to meet and discuss issues that affect cities and counties statewide. See Exhibit O.

In the 2005 5-Year Consolidated Plan, Idaho Department of Commerce identified the following goals and percentage of funding over the 5-year reporting period:

Preserve and Enhance Suitable Living Environments

• Improve Safety and Livability of Communities

15%

•	Increase Access to Quality Facilities and Services	15%
•	Improve Affordability and Sustainability of Facilities and Services	15%
Expand Eco	onomic Opportunities	
•	Create Jobs for Low- and Moderate-Income Persons	40%
•	Create Jobs that Pay a Living Wage and Benefits	35%
•	Revitalize Downtown Business Districts	5%

Increase Community Investment and Involvement

- Promote Effective Partnerships\*
- Support Efforts to Increase Local Capacity\*

The following table provides a summary of the progress Idaho Department of Commerce has made towards meeting the goals set forth in the 2005 5-Year strategic plan.

		2005 \$10,080,980		2006 \$9,122,695		2007 \$8,978,224		Total To Date \$28,181,899	
		Amt. Awarded	%	Amt. Awarded	%	Amt. Awarded	%	Amt. Awarded	%
<b>Goal</b> Suitable	<b>Strategy</b> Safety & Livability	\$2,816,210	28%	\$2,832,000	31%	\$2,655,049	29%	\$8,303,259	29%
Living	Increased Access	\$1,222,491	12%	\$2,479,911	27%	\$1,810,000	20%	\$5,512,402	19%
Environments	Affordability & Sustainability	\$2,270,700	23%	\$1,393,100	15%	\$1,400,000	15%	\$5,063,800	17%
Expand	LMI Jobs	\$1,860,000	18%	\$1,614,000	18%	\$1,150,000	12%	\$4,624,000	16%
Economic	Living Wages & Benefits	\$1,360,000	13%	\$1,114,000	12%	\$600,000	6%	\$3,074,000	10%
Opportunities	Revitalize Downtown Business Districts	\$500,000	5%	\$990,000	11%	\$899,800	10%	\$2,389,800	8%

As the table above illustrates, Idaho Department of Commerce is currently meeting all but two of its 5-year strategies. The strategy of <u>creating low- and moderate-income jobs</u> and the strategy of <u>prioritizing jobs that provide a living wage and benefits</u>, are receiving less funding than our 2005 planning projections indicated. Although the department has addressed the impediments identified in the environmental process, we did not see an increase in the utilization of CDBG funds for job creation projects.

There are likely two programs and one variable that are causing the reduction of CDBG requests than was initially projected. The Idaho Legislator has continued to fund the state's Rural Community Block Grant program and the Director Job Development Fund. Both programs focus

<sup>\*</sup> These activities are funded out of the 1% technical assistance set-aside.

on funding public infrastructure for jobs and last year obligated approximately \$3,850,000 towards infrastructure projects. Had these funds not been available, many of those projects would have utilized the CDBG economic development funds. In addition, with the current economic conditions, the country is experiencing, banks and financial institutions are limiting the availability of credit, which is resulting in fewer business expansions and locations.

#### **HOME Investment Partnership Program (HOME)**

Idaho Housing and Finance Association, the Participating Jurisdiction (PJ) for the State of Idaho's HOME program, strives to meet the State of Idaho's affordable housing goals. During the 2007 program year, IHFA awarded HOME funds to help build and purchase affordable housing throughout the state. HOME funds are awarded on a competitive application process based on the goals and strategies set forth in the 2005 State of Idaho's five-year Consolidated Plan for Housing and Community Development. IHFA reserves the right to address housing needs outside the framework of the competitive process to fund projects that demonstrate exceptional community value.

#### GOAL #1

### Increased access to decent affordable housing Strategies

- Sustain and increase home ownership
- Sustain and increase affordable rental housing
- Support access to a continuum of housing services

IHFA strives to meet its goal to increase and sustain affordable homeownership throughout Idaho by providing down payment and closing costs assistance to qualified persons below 80% Area Median Income. The American Dream Down payment Presidential Initiative (ADDI), with limited and decreasing funding, targets low and very low-income persons, with special interest, but not limited to households who live in a mobile home park or public housing. In addition to the ADDI, IHFA offers IHFA/HOME down payment/ closing cost assistance program, which is, in part, supported through the IHFA Mortgage Revenue Bond Program. HOME provides down payment/closing costs subsidy assistance to qualified IHFA Section 8 holders through the Homeownership Voucher Program (HOV) program, Self-Help (sweat equity) housing projects, IHFA's Community Housing Development Organizations sponsor the Mutual Self-Help projects

IHFA helped increase and sustain affordable rental housing in Idaho by using HOME funds to purchase Section 515 USRD rental properties. The current USRD program allows prepayment of a Section 515 loan under certain circumstances, which removes the mortgage provision requiring them to rent to low-income tenants. IHFA anticipates it will be involved in this type of rental housing preservation activity for many years to come.

In the Program Year 2007, IHFA provided HOME funds to Community Housing Development Organizations (CHDOs) and private owners/developers for acquisition, acquisition/rehabilitation/new construction activities for multi-family rental housing. These

activities increased the supply of decent, safe, affordable rental housing for qualified low and very-low households throughout Idaho, which include seniors and disabled persons.

**Results- Table #1** 

GOAL#1 To Increase Access to Decent Affordable Housing.				
Strategies	2007 Results			
	139	HOME Standard Down Payment/Closing Cost Assistancer association with the Mortgage Revenue Bond Program		
	1	HOME IHFA Section 8 Homeowner Voucher Program		
	29	HOME Self-Help Program		
Sustain and Increase Affordable Homeownership	2	HOME In-Fill Program		
	19	HOME Standard Down Payment Assistance associated with USRD 502 Loan Program		
	111	HOME participants in Finally Home! Homebuyer Education		
		HOME Program Special Needs - persons with disabilities, FSS		
Sustain and Increase Affordable Rental Housing	234	200 Units/ 38 HOME- New Construction 24 Units/1 HOME- Acquisition 10 Units/10 HOME- Acquisition/ Rehabilitation		
Support Access to a Continuum of Housing Services	15 1	Units of Senior Unit AHP (accessibility for handicapped persons)		

#### GOAL #2

### Preserve and enhance suitable living environments Strategies

- Improve safety and livability of communities
- Increase access to quality facilities and services
- Improve affordability and sustainability of quality facilities and services

IHFA and HOME funds helped improve the safety and livability in communities throughout Idaho by providing down payment/closing cost assistance for safe, decent, affordable homes to qualified moderate, low, and very low-income persons and/or families. HOME also helped preserve existing affordable rental housing in several small communities this past year by providing gap financing to these acquisition projects, thus ensuring long-term affordability. Housing Quality Standards and HOME Compliance monitoring will ensure this rental housing remains safe and decent for these community's low-income citizens.

IHFA and HOME also helped improve the safety and livability in Idaho communities by providing HOME funds to rental housing that targets persons with disabilities and/or seniors. All new construction rental projects involving HOME funds must meet the Model Energy Code, Section 504 and applicable laws including Handicap Accessibility requirements, Site and

Neighborhood standards, Environmental Review, Uniform Relocation, Fair Housing, Affirmative Marketing, Lead-based paint, and all other applicable federal regulations.

#### **Results- Table #2**

GOAL #2 Preserve and Enhance Suitable Living Environments			
Strategy	2007 Results		
Improve Safety and Livability of Communities	Single Family 158- Down payment/closing cost assistance  Rental Housing 1- Acquisition project-Coeur d'Alene 1-Acquisition/rehabilitation project- Idaho Falls 6- New construction projects- Coeur D' Alene, Blackfoot, Idaho Falls, Hayden, Moscow, & Pocatello		

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#### \* GOAL #3

### Increased community investment and involvement Strategy

• The strategies to meet Goal #3 are implemented through the CDBG program.

#### GOAL #4

### Increased community investment and involvement Strategies

- Promote effective partnerships
- Support efforts to increase local capacity in planning, administration and implementation

IHFA sponsors and hosts Regional Housing Round Tables in northern, southern, and eastern Idaho. The Roundtable meetings provide a forum to bring housing advocates, local service providers, city/county/state/ federal officials, state/federal elected representatives, local lenders, and housing developers together to discuss local, state, and federal housing issues. In addition to discussion, IHFA uses these meetings to disseminate new information and provide program and service updates. Cooperative partnerships, new initiatives, and opportunities are encouraged.

Community Housing Development Organization (CHDO) meetings were held in February and November at IHFA's Boise offices. The meetings are an ongoing effort to promote more effective partnerships, to increase effective communication, as well as receive updates and information. Local housing issues and concerns are openly discussed.

IHFA staff and administrators attend, sponsor and present at regional and state trainings and meetings, as well as meet individually with state and federal officials, developers, CHDOs, city & county officials, and other groups who maintain and/or create affordable housing.

The Idaho Community Review (ICR), with strong IHFA and IDC staff support and involvement, helps small communities manage change on their own terms. Upon request, ICR provides a team of volunteers with expertise in strategic and land-use planning; housing, community, and economic development; arts, tourism, community design and other critical fields. This "consulting team" works with host communities for several months on intensive community reviews and follow-up reports. Working together, the ICR has energized, engaged, and empowered 17 communities to date, providing tools, and strategies that cultivate vitality and resilience. During PY 2007, ICR performed two community reviews: Payette and Soda Springs.

Finally Home!® is a comprehensive homebuyer education program designed by Idaho Housing and Finance Association and other organizations in Idaho. This program is sponsored, in part by a Housing Counseling grant from the U.S. Department of Housing and Urban Development. The grant supports one-on-one housing counseling through IHFA, as well as partial support for the Idaho Partners for Home Buyer Education, Inc. (IPHBE), homebuyer education classes throughout the state. The grant encompasses housing counseling through group counseling (classes), and one-on-one counseling in the following areas: Pre-occupancy, mortgage default, reverse mortgage, rental delinquency issues, and homeless prevention. In 2007, IPHBE, Inc. made available their textbook in Spanish, a set of DVDs covering the homebuyer education course in Spanish, and a new web-based, on-line course in Spanish. The DVDs can be viewed by contacting one of the eight Regional Training Partners.

#### **Results- TABLE #4**

GOAL #4 Increase Community Investment and Involvement			
Stategy	2007 Results		
Promote Effective Partnerships	10- Round Table Meetings throughout the state, brought stakeholders together to discuss local and regional housing issues		
	2- informational/capasity building meetings held in Boise with Idaho's CHDOs		
	2- Idaho Community Review(ICR) completed for Payette and Soda Springs		
	1,705- Finally Home!®students - 1,525 first time homebuyers - 24% list themselves as a minority with 14% listed as Hispanic		
	58% of Finally HOME! ®graduates purchased a home		
Support Efforts to Increase Local Capacity in Planning, Administration and Implementation	IHFA with officials and developers in Teton, Kootanai, and Blaine Counties, as well as various communities throughout Idaho regarding affordable and workforce housing needs. HOME funds canl be used to help develop affordable units in these projects.		
	Community Frameworks, HUD regional Technical Assistance provider provided direct assistance to several Community Action Partnership (CAP) CHDOs in Idaho to build developer capasity, including specific affordable housing projects which target seniors, farmworkers, and self-help.		
	A northern Idaho community organization receives CHDO certification. Is currently in the predevelopment phase of a mixed-income rehabilitation rental project in Shoshone County. Two additional northern Idaho community organizations are exploring the possibility of pursuing CHDO certification.		

#### **Emergency Shelter Grant Program**

IHFA is the State Coordinating Agency for homeless programs, designated by the Governor in April 1990. During the 2007 program year, the Emergency Shelter Grant funded projects that fell under three of the state's four consolidated plan goals. Goal number three, *Expand Economic Opportunities*, does not apply to the Emergency Shelter Grant and is not addressed in the ESG general narrative.

#### Goal #1

Increased access to decent affordable housing

#### **Strategies**

- Sustain and increase homeownership
- Sustain and increase affordable rental housing
- Support equal access to a continuum of housing services

#### **Responsible Party**

IHFA through ESG and Continuum of Care

IHFA uses ESG funds to support transitional housing and emergency shelter programs that help individuals and families move successfully through the Continuum of Care and into permanent housing. ESG funds are also used in conjunction with IHFA private funds to help individuals and families remain housed through homeless prevention initiatives throughout the state. By making these services and funds available to a wide range of special needs populations in all areas of the state, IHFA is supporting equal access to the beginning steps of the continuum of housing services.

In the 2007 program year, IHFA continued to fund shelters that serve the many different populations experiencing homelessness in Idaho. Recipients of ESG funds are required to coordinate at the regional level to identify local homeless needs, collaborate with other homeless providers, and ensure access to a variety of housing and services for special populations. IHFA also maintains a website and multilingual housing hotline to assist individuals in accessing services statewide.

Homeless prevention funds continued to prevent individuals and families from losing their housing through limited one-time rental and utility assistance. All seven regions of the state received homeless prevention funds, either ESG or IHFA funded, based on their respective populations. This ensured that households in all areas of the state, both rural and non-rural, had equal access to homeless prevention funds. IHFA awarded \$54,000 in ESG funds to six non-profit service providers in five of the seven regions of the state. IHFA encouraged recipients to distribute ESG homeless prevention funds to qualifying families within 6 months, at which time IHFA provided an additional \$50,000 in private funds, supplementing ESG homeless prevention funds, and allowing sponsors to have access to homeless prevention funding year round. One additional sponsor spent the remainder of their 2006 homeless prevention allocation in the 2007 program year. In Regions 2 and 6, the two regions not receiving ESG homeless prevention funds, IHFA allocated a total of \$70,000 in private funds to its branch offices, providing one-time rental and utility assistance to households at risk of becoming homeless.

#### Goal #2

### Preserve and enhance suitable living environments Strategies

- Improve safety and livability of communities
- Increase access to quality facilities and services
- Improve affordability and sustainability of quality facilities and services

#### Responsible Party

IHFA through ESG and Continuum of Care

By providing housing and essential services to families and individuals experiencing homelessness, the Emergency Shelter Grant improves the safety and livability of communities statewide. In the 2007 program year, IHFA utilized ESG funds to support emergency and transitional housing providing 91,105 bed nights around the state. One new shelter project was funded this year, further increasing access to quality facilities and services in a rural community.

In the 2007 program year, ESG funds maintained and improved the quality of existing facilities by providing ongoing maintenance and repair to homeless shelters. In addition to routine maintenance and repair, significant improvements were made to two homeless shelters, making both more accessible for physically disabled clients. One of these shelters applied for and received 2007 ESG funds to modify the facility's kitchen area, making it more wheelchair accessible. A portion of their rehabilitation award was also used to perform necessary roof repairs. Another ESG project sponsor was awarded IHFA private funds to remodel their property to handicap accessible standards. Improvements were made to the facility's bathroom, kitchen, storage area, and bedrooms. A wheelchair ramp was installed on the back entrance of the shelter.

The matching resources documented for ESG project sponsors demonstrate both the support they have gained by providing quality programs in their communities as well as the sustainability they have ensured by diversifying their funding sources. Matching documentation was submitted to IHFA for the Annual Performance Report.

# Goal #3 Increased Community Investment and Involvement Strategies

- Promote effective partnerships
- Support efforts to increase local capacity in planning, administration and implementation

IHFA continues to facilitate meetings with the Idaho Homeless Coordination Committee. IHCC meetings provide an opportunity for different agencies, service providers, and regional homeless coalition representatives to share information as well as assess progress towards implementing the goals, strategies, and action steps necessary to reduce and prevent homelessness in Idaho.

IHFA requires recipients of ESG funds to participate in regional homeless coalition meetings. During the 2007 program year, meetings were held in each of the seven regions of the state. These meetings have better enabled service providers to partner with other service providers, community resources, and federal and state programs operating in their region. In the ESG application, applicants are required to report the number of regional homeless meetings that their organization has attended. If an organization is above the scoring threshold and awarded ESG funds, their level of regional participation, is part of the funding formula and will affect the amount of their award.

## Results- Table #1 Goal #1 Increase Access to Decent Affordable Housing

Strategy	2007 Results
Support Equal Access to a Continuum of Housing Services	Number of shelters who serve the following special needs populations:
	Alcohol and Drug Dependent- 15 Chronically Homeless-15 Developmentally Disabled -9 Domestic Violence Victims- 15 Elderly- 5 Families-11 Homeless Youth-2 Mentally III- 8 Physically Disabled- 8 Veterans-6
	Six (7) service providers distributed \$62,679.80 in ESG homeless prevention funds.
	Five (5) service providers distributed \$71,448.39 in IHFA private homeless prevention funds after spending their ESG homeless prevention allocation. Two (2) IHFA branch offices distributed \$59,291.22 in IHFA private homeless prevention funds.
	1165 homeless persons moved into transitional or permanent housing from ESG funded shelters.

#### **Results- Table #2**

Goal # 2:				
Preserve and Enhance Suitable Living Environments				
Strategy	2007 Results			
Improve Safety and Livability of Communities	One (1) new project sponsor provided 5 new emergency beds. The number of emergency beds statewide increased to 490. Thirty-eight (38) transitional beds were provided with ESG funds. Throughout the state, ESG project sponsors provided 91,015 bed nights.			
	Ten (10) sponsors performed \$26,104 in repairs and maintenance with 2006 ESG funds.			
	Eleven (11) sponsors performed \$14,702.41 in repairs and maintenance with 2007 ESG funds.			
Increase access to quality facilities and services	One project sponsor awarded \$13,971 for roof repairs and handicap accessible improvements to the shelter's kitchen. \$10,192.87 of the award utilized at the end of the program year.  Sponsor awarded \$34,360 in IHFA private funds for handicap accessible improvements. \$32,560 of the award utilized at the end of the program year.  Matching Resources for 2006 ESG: Private Cash \$74,775 Private In-Kind \$23,059 Local Government \$0 State Government \$0 State Government \$872 Federal Government \$0 Total \$98,706  Matching Resources for 2007 ESG Private Cash \$441,219 Private In-Kind \$170,103			
	Local Government \$1,750 State Government \$3,669 Federal Government \$12,800 Total \$629,541			

#### **Results- Table #3**

Goal #3 Increase Community Investment and Involvement				
Strategy	2007 Results			
Promote Effective Partnerships	The Idaho Homeless Coordination Committee held five (5) meetings with participation from the Department of Health and Welfare, the Department of Corrections, Department of Education/Foster Care, State of Idaho Substance Abuse program, as well as homeless service providers and representatives from each region.			
Support Efforts to Increase Local Capacity in Planning, Administration, and Implementation.	During the 2007 program year, Region 1 held 9 meetings, Region 2 held 4 meetings, Region 3 held 9 meetings, Region 4 held 5 meetings, Region 6 held 7 meetings, and Region 7 held 9 meetings.  Regional homeless coalitions also organized and conducted their respective 2007 point-intime counts in January 2007.			

#### **Affirmatively Furthering Fair Housing**

A summary of the actions the state has undertaken to affirmatively further fair housing and address the impediments to fair housing that were identified in the state's 2004 Analysis of Impediments to Fair Housing.

From 4/1/2007 through 3/31/2008, IHFA and IDC were actively engaged in cooperative and collaborative actions throughout the state, as partners in the Idaho Fair Housing Forum and though related projects outlined below:

- New Fair Housing web site. IHFA and the City of Boise sponsored development and hosting of <a href="www.fairhousingforum.org">www.fairhousingforum.org</a>, an online clearinghouse of information relevant to members of the Fair Housing Forum and related stakeholders. The site offers diverse perspectives of fair housing law and its impact on Idahoans, and is a simple reference point for those interested in the basics (an FAQ and Glossary section); or information specific to providers, consumers or advocates. It also offers a central location for news and events pertaining to fair housing education and outreach, case law, LEP/LAP, and other items of interest. IHFA's Community Housing Service Division manages the site with input from other Forum members.
- **Fair Housing Training/Conferences.** IHFA was a key sponsor (along with IDC and other Forum members) of the 2007 *Fair Housing: making it work* conference hosted by the City of Pocatello on 4/25/2007 and featuring keynote speaker Judith Keeler. IHFA, IDC and other Forum members began planning and preparation in October, 2007 for the 4/22/2008 Fair

Housing Conference in Nampa, Idaho, which was attended by over 300 individuals with a keynote address from HUD's Lynn Grosso.

- 2009-2010 Idaho Fair Housing Calendar. Planning and preparation for the 2009-2010 Idaho Fair Housing Calendar. Fair Housing Forum members partnered with the Idaho Human Rights Education Center on a 2007/2008 art competition for Idaho students. Forum members selected and will include artwork for in an 18-month calendar to be distributed in fall 2008. The calendar is similar to one produced and coordinated by IHFA and IDC in 2006-2007, the purpose of which was to create an ongoing awareness of Fair Housing, diversity, and accessibility issues. Work on the current project began in the fall of 2007, and the contest yielded over 400 entries during the school year.
- New housing locator tool. IHFA sponsored and manages a new bilingual, ADA-compliant housing locator tool at <a href="www.housingidaho.com">www.housingidaho.com</a> to provide an efficient and accessible link between tenants and housing providers. All marketing materials are in English and Spanish, and both the site and a full-serve call center provide information in English and Spanish. IHFA is working with IDC and other housing stakeholders to broaden the scope and services of the site, and illustrate the use of the promotional materials to support the affirmative marketing strategies of communities and housing providers.
- Statewide LEP training. IHFA made use of its Regional Housing Roundtable Forum to present information on Limited English Proficiency (LEP) and Language Assistance Plans (LAP) to over 200 housing and local government stakeholders. With the generous participation of the Boise City/Ada County Housing Authority's Rob Christensen, Roundtable members received information on creating an effective plan to provide better customer service to LEP clients. Informational materials and the LEP presentation are provided at <a href="https://www.fairhousingforum.org">www.fairhousingforum.org</a>.
- **Bilingual materials.** IHFA has translated key program materials into Spanish, the second most common language spoken in Idaho after English. These include:
- Housing Counseling posters
- Housing Counseling brochures
- Finally Home textbooks
- o Finally Home online course
- o Finally Home brochures
- Homeownership Lending brochures
- o <u>Housingidaho.com</u> pens
- o Housingidaho.com posters
- o Housingidaho.com rack cards
- Housingidaho.com bookmarks
- o FSS brochures
- Section 8 Tenant brochures
- o Blaine/Lincoln County Home Equity Partnership Fund flier
- HOPWA brochure

**LEP preparedness** IHFA contracted with Language Line Services to accommodate non-English speakers, and has staff on site in its Boise and statewide branch offices that can assist clients in the following languages: Spanish, French, Czech, Arabic, Basque, and German. We are collaborating with the Idaho Office for Refugees to prepare staff to better serve a variety of Idaho's new residents from a variety of language groups.

Impediments to Fair Housing (these items are ongoing and unchanged from previous years): Lack of ready access to fair housing complaint data in a useable format and from a single source. HUD currently requires a FOIA request for data on fair housing complaints and their disposition. The data has historically been collected and stored in a way that makes it extremely cumbersome for end users to sort. Many different search items are lumped into a single field, for instance. This makes it unnecessarily difficult to understand or analyze the distribution of complaints by location or type in order to create a useful educational strategy. IDC made such a FOIA request in mid 2006 and had yet to receive the requested data as of May 2007.

<u>Action</u>: Several Idaho users have brought this to FHEO's attention over the years. Recommend that HUD/FHEO consult with a database specialist to convert existing and historic data to a more flexible and accessible searchable format, separating search items into separate fields. This database could then be made available online (minus any protected/exempt information) for use by those researching patterns of complaints, disposition of cases, etc. The result would greatly simplify efforts to affirmatively further fair housing among all stakeholders and HUD grantees.

<u>Impediment</u>: Historic barriers and animosity among stakeholder groups have limited effective cooperation and collaboration. (Evolving/improving with some exceptions)

Action: The Idaho Fair Housing Forum, a joint project proposed and facilitated by HUD Field Office representative Brian Dale, has been meeting regularly to discuss issues involving various stakeholders and devise educational and policy strategies to reduce or overcome barriers. These activities (and their planning) have offered several opportunities for diverse stakeholder groups to work together on common goals, and the Forum itself creates a 'safe' environment in which stakeholders can cultivate new relationships based on cooperation and trust. The process is resulting in impressive collaborative partnerships and a sense of community synergy among members.

While the Forum members work well among themselves and as an expanding group, the Intermountain Fair Housing Council has elected not to participate since early 2007. The reason given by the Executive Director was that the Forum was not sufficiently advocacy/enforcement oriented. Members welcome the Council's participation with the understanding that the Forum's environment of civil and productive conversation is maintained and its members and their diverse opinions are respected.

**Impediment:** Some consumers may not document complaints they feel to be legitimate. It is thought that in some cases consumers fail to document cases either out of ignorance of their rights under the Fair Housing Act or because of fear of retaliation or loss of housing. **Action:** By engaging cities, counties and professionals in the housing and lending industries, stakeholders are enhancing the overall awareness of responsibilities under the Fair Housing Act. The Idaho Fair Housing Forum, led by IHFA and IDC, began work in 2007 to create 2009-2010 calendars to distribute to Idaho businesses, schools, housing providers, case managers, and government offices. These calendars feature fair housing-inspired artwork and writing by Idaho

students, along with a listing of resources available to consumers and providers. The process of coordinating and promoting the art contest and resulting calendars created numerous opportunities for Idahoans to engage in productive dialogue to increase their understanding of rights and responsibilities under the Act. Response to the initial calendar was so positive that our next version will feature an 18-month time frame.

<u>Impediment</u>: Many Idahoans lack an understanding of how to access housing and community resources.

Action: IDC and IHFA take part in several initiatives designed to increase awareness of available resources. One good example is the Idaho Community Review, a collaboration among diverse public, private, and nonprofit entities facilitated by the Idaho Rural Partnership. The aim of this project is to work with rural Idaho communities to diagnose and describe local needs, then prescribe effective strategies to address those needs. The resulting Community Review Report provides a practical reference of the team's observations and recommendations and a listing of available resources. Contact information for each member organization is provided, and reports are made available to the public free of charge. This provides local officials and residents a direct link to resources and those who administer them, along with access to the collective expertise and technical assistance of the Community Review Team.

Fair Housing and accessibility of community resources and services are stressed during each review, along with the importance of public participation and community diversity. The Community Review Visiting Team members discuss these issues with individuals and community leaders as well as referencing them in our community discussions and final reports.

#### **Affordable Housing**

Worst-Case Needs

In 2007, HOME funds provided long-term affordable units in several new construction rental projects throughout Idaho, including Blackfoot, Pocatello, Idaho Falls, Lewiston, Moscow, Hayden, and Coeur D'Alene. Five of these projects target seniors and persons with disabilities, whose incomes are 50% Area Median Income or less. Three of these projects target seniors who may be spending 50% of their current fixed-income toward housing. IHFA continues to collaborate with Community Housing Development Organizations (CHDOS) to address regional housing needs. IHFA collaborates with other affordable housing entities as well to strategize and generate affordable housing projects that are identified as a need in their community. IHFA continues to provide technical assistance to CHDOs to develop organizational capacity for new rental and homebuyer activities.

IHFA participated in several meetings of the Department of Corrections' (DOC) Innovative Workgroup for Offender Management (IWOM). The DOC acknowledges that housing for exoffenders has become the next big bottleneck issue for the Department. They invited IHFA to participate in the meetings as a leader in the housing field. The issue of homelessness for men and women coming out of the prison system is a very real issue, and the DOC is attempting to take a proactive approach. IHFA gained a great deal of insight by participating in these meetings, which has led to some internal discussion of whether IHFA may possibly provide targeting housing assistance using HOME TBRA for prisoner re-entry in the future. Currently,

DOC is also a participant in the Idaho Homelessness Coordination Committee, led by IHFA, who is responsible for Idaho's 10-Year Plan to end homelessness.

The new statewide online rental housing resource, <a href="www.housingidaho.com">www.housingidaho.com</a>, may provide some immediate help by placing individuals transitioning out of Idaho's corrections system with available rental housing. IHFA is working to add a special needs feature to this system that will allow caseworkers to access rental housing that is willing to work with special needs populations.

IHFA continued to be an active participant on the Governor's Manufactured Home Park Advisory Committee to address trailer park issues throughout the State of Idaho. The Committee researched manufactured home ownership laws, reviewed available resources and programs, and reviewed what other states were doing to address trailer park closures. The Committee recently completed its work and a report was sent to the Governor's office. Some of the recommendations made to the Governor include funding for the Idaho Housing Trust Fund (created in 1992 but never funded) and better education for those who live in mobile home parks regarding both their rights and risks under current Idaho Law. IHFA acknowledges the sale of older mobile home parks is another bottleneck issue facing the State of Idaho. Current Idaho law allows the sale of the land with a 180- day Notice to Vacate to a mobile home owner(s), who must pay all moving costs, if under city/county ordinance, they are able to move the mobile home to another site.

HOME staff attended a training sponsored by Boise Neighborhood Housing Services that focused on the preservation of trailer parks through a land trust model or cooperatives. The information gained could be beneficial in using HOME funds for future preservation efforts.

#### **Continuum of Care**

Actions the state has taken to address the needs of homeless persons or persons with special needs that require supportive housing, actions taken to prevent homelessness and facilitate the transition into permanent housing, and identify new Federal resources obtained from the Homeless SuperNOFA (Notice of Funding Availability).

#### **Actions to Address Needs of Homeless Persons and Persons with Special Needs:**

IHFA continued its innovative and comprehensive strategy to battle homelessness over the last year. A summary of this approach, which previously received an NCSHA Award of Excellence, is located as Exhibit H in the Appendix to the CAPER. This summary succinctly describes IHFA's approach to addressing the needs of the special needs populations around the state by facilitating one statewide coordinating committee for addressing homelessness that is comprised of regional representatives of smaller committees from around the state.

#### **Actions to Prevent Homelessness:**

IHFA continued to support Homeless Prevention (HP) through both the Emergency Shelter Grant and through IHFA private funds. 10.27% of the 2007 Emergency Shelter Grant was allocated to Homeless Prevention Activities. IHFA allocated an additional \$120,000 in private

funds to be distributed for homeless prevention activities. These funds were allocated to IHFA branch offices and services providers throughout the state.

#### **Actions Taken to Address Emergency Shelter:**

IHFA administers the Emergency Shelter Grant program statewide. Through the 2007 Emergency Shelter Grant, \$499,475 was allocated to 19 different non-profit organizations throughout the state. Funding supports shelter rehabilitation, operations, essential services, and homeless prevention activities. In the 2007 program year, 2,934 individuals were served and 91,015 bed nights were provided.

### Actions Taken to Address Transitional Housing Needs of Homeless Individuals and Families (including significant subpopulations):

IHFA administers the Supportive Housing Program in 43 of Idaho's 44 counties. Sixteen different transitional housing programs receive SHP funds through IHFA. In the 2007 Continuum of Care, IHFA was awarded \$2,050,826 under the SHP program, of which \$1,331,737 was allocated to these 16 transitional housing projects. Transitional housing programs address the housing needs and provide the support homeless families and individuals need in order to transition into permanent housing. Homeless persons live in transitional housing for up to 24 months. Limited ESG funds are also awarded to transitional housing programs. Each service provider is required to participate in regional homeless coalition meetings to ensure that the needs of various homeless populations are being served.

#### **Actions Taken to Address Permanent Housing Needs**

HOME funds provided gap financing for one SHP project in Pocatello in 2007. This Supportive Housing Program(SHP) project provides permanent housing for individuals who are defined by HUD as Chronically Homeless with a disability. HOME funds provided long-term affordability for 10 of the 12 units in the project.

In the 2007 program year, IHFA supported four permanent housing projects with \$388,472 in SHP funds. A new permanent housing program for chronically homeless women began operations on April 1, 2008 providing nine additional units.

#### New Federal Resources Obtained from the Homeless SuperNOFA

In the 2007 Continuum of Care award, IHFA received funds for two additional SHP projects. One will create 12 units for chronically homeless individuals and one will create 12 units for disabled individuals. Both programs will begin serving clients in the 2008 program year.

#### Other Actions

This section describes the actions the state took during program year 2007 to address obstacles to meeting underserved needs, maintain affordable housing, remove barriers to affordable housing, address lead-based paint hazards, reduce the number of poverty level families, develop institutional structure, enhance coordination between housing and social service agencies, and foster public housing resident initiatives.

#### Address Obstacles to Meet Underserved Needs

The following obstacles are identified in the State of Idaho Five-Year Strategic Plan to meet underserved community and economic development needs.

#### Obstacle: Administrative burden for non-entitlement areas

HUD's planning, administration and reporting requirements are geared toward large entitlement communities that can support larger, more diverse and specialized administration. The regulatory complexity of HUD programs, from lead-based paint to fair housing law presents very real impediments to smaller, rural communities in Idaho.

The many small, citizen government entities throughout Idaho face the practical challenges of staff and local elected officials who are stretched thinly across multiple duties. It is rare to find dedicated persons with the administrative capacity to undertake complicated projects; therefore, technical assistance and training play an important role in cultivating capacity and project administration.

Actions: IHFA and IDC continue to sponsor training events and serve as trainers at Association of Idaho Cities and Idaho Association of Counties conferences. These events provide ideal opportunities to meet with a large number of local elected officials and their staff. IDC is currently administering a new Growth Management grants programs to help 14 cities and counties to address locally identified growth related issues. In conjunction with receipt of these awards, all communities are required to participate in training in the areas of impact, comprehensive planning, and zoning and subdivision ordinances. Certified grant administrators who work with the ICDBG program have assisted 15 cities and counties to write or update their Fair Housing Outreach Plans and Analysis of Impediments and 12 cities and counties write or update their Section 504/ADA Self Evaluations and Transition Plans.

#### Obstacle: Inadequate capacity for local cooperation, planning, or support

This obstacle involves the costs associated with public outreach and participation, long-term planning and local cooperation among public and private stakeholders. Uncertainty regarding local fees and tax assessments also threaten the viability of many restricted-rent housing options. Successful programs depend largely on the support and investment of local elected officials and community members. Communities that are unable to plan strategically are less likely to focus effectively on priorities. Therefore, we see an ongoing benefit to encouraging public participation and comprehensive planning, especially in smaller communities. The need for senior housing and housing for persons with disabilities continues to be a priority need in Idaho.

<u>Actions:</u> IHFA continues to provide HOME technical assistance to the State of Idaho's ten certified CHDOs. These community-based development organizations own, develop and/or sponsor affordable housing in their individual communities/geographic areas. HOME regulations require 1/3 of a CHDO Board of Directors to have low-income representation. A CHDO must have a board approved formal process to "include low-income participants in the siting, development and management of affordable housing." These two HOME program requirements help to ensure the low-income community has a voice in the decision-making process.

<u>Actions:</u> During PY 2007 IDC administrated the Growth Management grant program, which is designed to assist communities with self-identified planning and growth issues on a regional and local basis. Fourteen cities and counties received funding this year.

IDC continues to participate in the Valley-Adams County Planning Partnership (VAPP). VAPP is a partnership between community leaders, state, local, and federal service providers, and citizens. Its mission is to address growth-related issues in the region, including Valley County and the cities of Donnelly, Cascade and McCall and Adams County and the cities of New Meadows and Council.

IDC continues to be an active partner and sponsor for the Northwest Community Development Institute. Since 1999, the Northwest Community Development Institute (NWCDI) has provided community and economic development practitioners and volunteers with formal training designed to address complex issues that present challenges and opportunities for local citizens. Experienced instructors from throughout the Northwest and around the country offer the latest information, strategies, and management techniques in community and economic development. During 2007, NWCDI had 83 attendees for the three-day training event that was held in Boise.

Both IHFA and IDC continue as active participants in the Idaho Community Review program. The mission is to efficiently and effectively provide the host community with objective information from external community development professionals, create a forum to express internal leadership viewpoints and citizen feedback, recommend resources, and provide follow-up as needed. This project seeks to help communities bolster their action plans to locally execute and complete community development strategies. During PY 2007, two communities, Soda Springs and Payette County, had community reviews performed.

Both IHFA and IDC continue to be active participants in the Idaho Community Review Program (ICR). To date, ICR has energized, engaged, and empowered 17 communities, providing the tools and strategies that cultivate vitality and resilience. This program serves to help communities bolster individual Action Plans, as well as build community capacity to locally establish, execute and complete their community development goals. The Idaho Community Review (ICR) goal is to help small communities manage change on their own terms. This year's ICR volunteers included experts in strategic and land-use planning, housing, community, and economic development, arts, tourism, community design and other critical fields. This "consulting team" worked with host communities for several months on intensive community reviews and follow-up reports. During PY 2007, ICR performed two community reviews: Payette and Soda Springs.

#### **Obstacle: Inadequate funding to meet needs**

At the federal level, recent and projected cuts in domestic programs are reducing investment in American communities at a time of increasing need for workforce housing and community and economic development. The rate of increase in the cost of purchasing or renting homes is greater than the rate of increase in annual household income, widening the gap in access to affordable housing options.

Underemployment and cost of living increases are stressing American households and communities. The programs that provide Americans a safety net and second chance are being reduced or dismantled.

Actions: IDC continues to address the issues of community and economic development throughout the state of Idaho. ICDBG funds are used to assist in the implementation of quality public facility, community, and senior citizen center projects. IDC staff work closely with other federal and state funding agency to partner on projects that are viable and ready to proceed. Economic development is facilitated through grants awarded by the ICDBG, Rural Community Block Grant, and Idaho Gem Grant Programs. These grants allow communities to develop publicly owned infrastructure and building improvements in order to assist a business to locate expand or remain in their community. IDC economic development staff also administers the rural professionals program, which helps provide funding for 14 local economic development professionals throughout rural Idaho.

The HOME Program helped HUD's Supportive Housing Program (SHP), by providing funds to help build a new rental housing project (10 HOME units) for persons with disabilities who also meet HUD's definition of chronically homeless in Pocatello Idaho.

#### **Obstacle: Speculative investment and cascading inflation:**

During the 1990s, average housing costs in Idaho increased 38.63%, while median household income rose only 7.13%. Since 2000, the price of bare land and real estate has increased as much as 700% in some markets. These artificially high values then become comparables for subsequent appraisals, and the cycle is repeated. In rapidly developing communities, this limits access to property that is affordable to low- and moderate-income populations.

Actions: Affordable housing for Idaho's low-and moderate-income residents is still out of reach in many of Idaho's communities. In an effort to address the still artificially high cost of housing, several action steps were taken to address this issue over the past year. Both IHFA and IDC continued to be active members of the Governor's Mobile Home Task Force and worked with a variety of key stakeholders to draft a series of recommendations to the governor. Taskforce members explored finding additional funding sources for the relocation trust fund and identifying incentives and other actions to prevent mobile home parks from being sold to developers. Recommendations were sent to the governor's office in spring of 2008. In early 2008, IHFA began drafting a pilot project for its high cost resort areas that would allow up to \$50,000 to buy down the price of housing in conjunction with local land trusts and other providers to keep the properties perpetually affordable for those under 80% of median income.

#### **Obstacle: Unfunded mandates**

As new federal standards, initiatives, and regulations are implemented, the demands on small local communities and organizations are amplified. These new requirements typically demand additional administrative and professional capacity at the local level. These include Davis-Bacon Wage Act, Section 3 compliance, ADA/504 compliance, Fair Housing, and EPA, including Lead-Based Paint and water quality. If not accompanied by adequate administrative resources, these mandates can siphon already limited resources from actual service delivery and other program areas. In addition to the practical limits of administrative staff, unfunded mandates typically meet with strong local resistance, which limits program effectiveness and efficiency.

<u>Actions:</u> IDC has partnered with its primary funding partner USDA – Rural Development to develop a joint environmental review process. This effort should help cities and counties reduced duplicative review processes, therefore, saving time and money. IDC is currently investigating establishing a similar process with another funding partner, Idaho Department of Environmental Quality.

IHFA and IDC collaborated with a variety of public and private sector participants to organize and host a Fair Housing training event in Pocatello on April 25, 2007. 165 attendees gathered in Pocatello to receive training in: Introduction to Fair Housing, Fair Housing Design and Construction, Fair Housing and Your Marketing Plan and Predatory Lending, and Fair Housing Implications. IDC partnered with USDA-RD to develop a join environmental review process.

IDC conducted five CDBG application workshops to assist potential applicants on the preparation of their application. The workshops addressed the applicable federal requirements and how they are applied by the applicant.

#### Foster and Maintain Affordable Housing

IHFA's Homeownership Lending division provides below market interest rate mortgage loans to first time homebuyers financed through mortgage bonds and allocates the Low-income Housing Tax Credit program for affordable multi-family rental housing, in addition to allocating HOME funds for affordable multifamily rental housing and single-family homeownership opportunities. The effectiveness of these programs in maintaining affordable housing in communities across the state, is facilitated by the fact that IHFA also administers the Idaho Community Reinvestment Corporation (ICRC). The ICRC utilizes pooled bank funds to rental housing developers that provide below-market interest rate permanent loans amortized over 30 years. In 2007, ICRC began offering a deferred loan to non-profits who build affordable, single-family homes to help finance their project's upfront infrastructure costs.

IHFA continues to have the financial resources and professional expertise to provide developers an affordable construction/permanent combination loan. This lending alternative benefits the development by reducing expenses from duplicate third-party expenses incurred by using two separate loans (construction and permanent).

IHFA is also able to provide bridge loans to developers who have received allocations of tax credits for their projects. By using a low interest bridge loan to postpone a portion of the equity investment required from the tax credit investors, developers could negotiate a higher price for the tax credits and receive a larger equity investment. This in turn reduces the amount of the permanent loan and allows for greater affordability.

IHFA made great strides in another approach to help foster affordable housing in early 2008 with the creation of the HOME Partnership Foundation, Inc., an independent 501(c) 3 organization that will help Idaho communities meet some of their most pressing housing needs through charitable donations. IHFA combined its housing expertise with the Foundation, the State's only foundation specializing in charitable giving for critically needed affordable housing. The Foundation works to assure families and individuals can obtain stable, safe, and affordable housing by providing stewardship of charitable gifts to support a variety of programs.

Another important issue to develop over the last year, was the need to address the preservation of existing affordable housing around the state. IHFA applied for a grant from the MacArthur Foundation under their national initiative to preserve affordable rental housing. In March 2008, IHFA was notified it had been selected as one of twenty finalists for this grant. If successful, the funding will be used for a two year project to (a) collect relevant housing data and create an affordable housing inventory to determine how many and what categories and types of housing are affordable in the state of Idaho, both subsidized and non-subsidized, (b) create a meaningful risk analysis of that housing stock with regard to its remaining affordability, including a conversion time-line, (c) convene a working group to develop and implement a comprehensive strategy designed to prioritize preservation of affordable housing throughout the state. This strategy will provide tools to help communities evaluate their stock of affordable housing, including manufactured home parks, and (d) establish a housing fund to leverage community investments for preservation.

#### **Barriers to Affordable Housing**

#### Administrative burden for non-entitlement areas

**Action:** IHFA has provided technical assistance to our non-entitlement communities. IHFA is also an active participant in numerous community groups such as VAPP and ICR. Senior staff has been involved in discussions surrounding property tax reform, and have attended all economic planning sessions to offer insight on housing and funding. IHFA took the lead role as Chair on the interagency council to develop the ten-year plan to end homelessness.

#### Inadequate capacity for local cooperation, planning, or support

Action: IHFA staff are heavily involved in the Community Review program. In 2007, two (2) communities requested a Community Review. This program helped small communities analyze the strengths and weakness within the community, including housing and opportunities for economic growth. Technical assistance and affordable training continue to be a supporting factor in the capacity building for communities as well as organizations serving the community to help in the stability of the area. IHFA has dedicated staff and resources to help communities struggling with inflated property values and a lack of community/workforce housing. IHFA worked with two regional high cost area communities to assess housing needs and create strategic housing plans with local stakeholders. Based on their needs and community support, IHFA is implementing a Workforce Housing program. If approved, HOME funds will help provide the affordable housing units.

### Inadequate funding to meet needs. A fundamental impediment to progress involves inadequate funding for programs

**Actions:** IHFA continued its efforts to work with state policy makers on affordable and workforce housing issues, as well as maintaining membership in national housing groups that work to increase, or at the very least maintain, HUD budgets for programs such as HOME, Section 8, Public Housing, and CDBG. IHFA continued to explore the possibility of starting a HOME-funded TBRA program to help those in need of affordable rental housing IHFA has

continued to seek out additional funding through private or public grants that may be available to help offset the needs of those moving through Idaho's Continuum of Care. In early March 2008, IHFA submitted a Letter of Interest to the John D. and Catherine T. MacArthur Foundation for funding to create an affordable housing preservation strategy for the State of Idaho and fund preservation activities. IHFA was accepted as one of twenty-one finalists for an award and will compete for awards to be announced in December 2008. If accepted, this award could help preserve 360 units of affordable housing that would otherwise be lost. This includes both subsidized and non-subsidized units and manufactured housing. In March 2008, IHFA submitted a Substance Abuse Mental Health Services Administration grant for Targeted Capacity Expansion. If funded, this grant will provide \$400,000 in funding for Eastern Idaho to help them provide substance abuse and mental health services to low-income people. IHFA also submitted requests to the Paul G. Allen Family Foundation and the M. J. Murdock Family Foundation, but those requests were not funded.

### Inadequate funding to meet needs. A fundamental impediment to progress involves inadequate funding for programs

**Actions:** IHFA continued its efforts to work with state policy makers on affordable and workforce housing issues, as well as maintaining membership in national housing groups that work to increase, or at the very least maintain, HUD budgets for programs such as HOME, Section 8, Public Housing, and CDBG. IHFA continued to explore the possibility of starting a HOME-funded TBRA program to help those in need of affordable housing and facing an average wait time of 2 years for Section 8 rental assistance or public housing.

#### Speculative investment and cascading inflation.

**Actions:** During the 90's, average housing costs in Idaho increased 38.63%, while median household income increased only 7.13%. Since 2000, the price of bare land and real estate has increased as much as 700% in some areas. Low interest rates, speculative investment, debt restructuring, and profit motive all coincided with increasing pressure on real estate appraisers to inflate property valuations.

IHFA continued to participate in meetings within areas of high inflations, such as our resort communities, which are seeing land value skyrocket out of control and in turn have made in nearly impossible to develop affordable housing in those areas. IHFA has also taken the lead to partner with local communities dealing with inflated housing costs and property values. IHFA continues to work closely with the resort communities in Blaine County and has a certified CHDO in Blaine County that is a Community Land Trust. The CHDO is currently working to acquire land in this designated high cost area. A new CHDO was certified in the Silver Valley in Northern Idaho--an area on the cusp of becoming another resort destination within Idaho. This CHDO is currently in the predevelopment phase of a mixed-use, mixed-income acquisition/rehabilitation project. A third CHDO is exploring a homebuyer activity in Teton County, with a mix of workforce and affordable housing.

Unfunded mandates. As new federal standards, initiatives, and regulations are implemented, the demands on local communities and organizations are amplified

**Actions:** In addition to the practical limits of administrative staff, unfunded mandates typically meet with strong resistance, which limits program effectiveness and efficiency. Federal Standards, initiatives and regulations are creating demands on local communities and organizations that are affecting the efficiency in which they can run their programs. IHFA continues to work closely with local and regional entities to help them maximize their limited resources. This barrier becomes more difficult with each passing year.

IHFA remains committed to its mission and efforts to find grants, public or private, that may help ease this burden.

#### **Lead Based Paint**

At the time of the 2000 census, roughly half the homes in Idaho had been built prior to 1971. It is estimated that approximately 264,000 homes may contain lead-based paint.

IHFA strongly supports the education of individuals and communities to the hazards of lead-based paint. Due to the lack of state regulations, this creates barriers regarding guidelines or enforcement standards. IHFA continues to help reduce lead based paint hazards throughout the state by helping to funds rehabilitation projects that will reduce the number of housing units that contain lead-based paint.

IHFA requires the Lead-Based Paint assessment for any project built pre-1978. In March 2007 and 2008, IHFA helped sponsor and advertise the Lead Safe Work Practices trainings in Boise. IHFA is currently a member of the Treasure Valley Lead Based Paint Task Force, whose task is to disseminate current information about Lead-Based paint dangers and EPA's Lead-Based Paint Final Rule.

IDC requires all applicants to review projects for lead-based paint hazards and provide mitigation measures where applicable.

#### **Anti-Poverty Strategy**

The Idaho Department of Commerce's anti-poverty strategy is to assist cities and counties with the funding of public infrastructure that meets the needs in order for a business to expand, locate, or stay in business. Businesses that benefit from the CDBG infrastructure investment are required to hire or retain employees and ensure that at least 51% of the employees they hire or retain are low-to-moderate income (LMI). Jobs set aside for LMI individuals, allow them to make a living and increase their skill sets. Job experience and higher skill sets will afford more job opportunities for these LMI individuals.

In 2003, the Idaho Partners for Prosperity (PFP) was formed by community and educational leaders in Eastern Idaho and was one of four organizations invited to apply for Northwest Area Foundation grant intended to reduce poverty and increase prosperity. PFP subsequently applied for and in 2004 was awarded one of two private community grants of \$11 million dollars over a ten-year period; funds are to be used to improve local economic, educational and services collaboration in order to reduce poverty.

PFP representatives regularly participate in IHFA's regional housing roundtable forum discussions, the Idaho Community Review process, and the IDC Rural forum meetings. This collaboration will provide an opportunity to identify needs and explore cooperative anti-poverty efforts among various state and regional entities.

#### **Institutional Structure**

Idaho Department of Commerce believes that the department does not have gaps in its institutional structure, or in the delivery of the ICDBG program. ICDBG program strengths include that the department consistently work and coordinate with local economic development districts throughout the state, our employees provide onsite technical assistance, and our program specialists work closely with our certified grant administrators.

Activities identified in the 2007 Action Plan to improve delivery of the ICDBG Program were, to make IDC Community Development Specialists available to provide on-site technical assistance and to continue to develop the Idaho Department of Commerce website to increase access to quality information.

Staff specialists provided on site-technical assistance to 42 cities and counties during PY 2007. Technical assistance activities can range from strategic planning and project development to onsite training. For a complete list of the communities assisted, see Exhibit O.

IDC staff has also continued to work to improve the amount and quality of data available on the IDC website. The department has recently added median housing cost data and updated community and labor market profiles. In addition to new data, IDC makes all planning documents and reports available for citizens, cities, and counties to view online. Census data, planning information and a full description of each assistance program the department administers is also online.

In addition to meeting the goals outlined in the 2007 Annual Action Plan, IDC took the following steps to improve delivery of the ICDBG program throughout the state of Idaho.

IDC held 5 application workshops. The workshops were held September 5<sup>th</sup>, 6<sup>th</sup>, 11<sup>th</sup>, 12<sup>th</sup>, and 13<sup>th</sup> 2007 in Post Falls, Orofino, Boise, Jerome and Ammon. 53 persons attended representing mayors, non-profit associations, economic development districts, design professionals, and private businesses.

IDC held meetings with US Department of Agriculture-Rural Development, Army Corps Of Engineers, Department of Environmental Quality, the Environmental Finance Center and representatives from economic development districts to discuss community needs and coordinate efforts to meet those needs.

Enhance Coordination Between Public and Private Housing and Social Service Agencies
Both IHFA and IDC were active participants in the Fair Housing forum, which works with
members of various agencies throughout the state of Idaho to address fair housing concerns. In
addition to including realtors, advocacy groups, government representative agencies, and funding
agencies, the forum has recently added NARPM (National Association of Residential Property

Managers) and other housing providers throughout the state to our group. These new voices have increased the coordination between the various parties who have an active interest in fair housing issues.

In addition, IHFA continued to sponsor quarterly regional housing roundtable meetings, which provided an opportunity to discuss and resolve outstanding issues. Minutes of these meetings are posted online for review.

#### **Foster Public Housing Resident Initiatives**

(Note: The State of Idaho does not own any public housing. IDC has no jurisdiction over public housing)

IHFA operates a 76-unit Public Housing program that includes 29 individual scattered sites throughout Idaho Falls and a 47-unit apartment building in Kellogg that has an application preference targeting the elderly and/or disabled. Public housing residents are solicited and encouraged yearly to participate on a Resident Advisory Board.

IHFA administers the federal Section 8 Rental Assistance Program in 34 of 44 Idaho counties. Four branch offices serve Idaho communities that do not have a local public housing authority. Regional Public Housing Authority plan hearings and outreach efforts to participants and the community continue in areas covered by IHFA branch offices. IHFA continues to work with Boise City/Ada County Housing Authority, Nampa Housing Authority, Southwest Idaho Cooperative Housing Authority, and the Pocatello Housing Authority to develop systems and programs that benefit low-income families and individuals through the voucher programs, public housing programs and Family Self-Sufficiency (FSS) programs.

Idaho Housing and Finance Association (IHFA), the Home Partnership Foundation, Inc., (Foundation) and United Way of Treasure Valley have teamed up to help qualified individuals and families become financially independent through the use of an Individual Development Account (IDA). An IDA is a matched savings account for individuals and families to help build assets and enter the financial mainstream. Each dollar a participant invests in a restricted savings account is matched from Assets for Independence Funding (AFI) (a Health and Human Services grant received by UWTV and another dollar from a non-federal matching source.

The Non-federal matching sources used with this grant include IHFA private funds, as well as contributions to the foundation from individuals and businesses in the communities where IDA families live, including Partners for Prosperity in Idaho Falls.

#### **Leveraging Resources**

This section provides an overview of how CDBG and HOME funds were leveraged, including how those funds were used to address the state's goals and strategies and how program matching requirements were met.

#### **CDBG**

Idaho Department of Commerce received \$8,978,224 in CDBG funds for PY 2007. The state and local communities leveraged \$154,365,183 to match CDBG funds that were used to fund projects and state administration activities. State administration is funded using \$100,000 plus 2% of the state's total CDBG award. During PY 2007, the state was allocated \$279,564 in administration funds, and was required to provide \$179,564 in matching funds. As of March 31, 2008, the state had provided \$194,686 in match. The CDBG program does not require communities to provide any match in order to receive an ICDBG grant, but the state's competitive grant process does award points to communities who do provide match. As a result, many of the projects that receive ICDBG funding do leverage matching funds. For every CDBG dollar invested, IDC and local communities leveraged \$14.45 to match the 2007 HUD CDBG grant award. The table below provides a summary of sources of match, the match that was leveraged, and the strategies that were addressed.

Type/Source	Match Amount	Strategy Addressed
Cash, bonds, in-kind, US Department of Agriculture-Rural Development loans, Department of Environmental Quality loans	\$35,861,931	<ul> <li>Improve safety and livability of communities.</li> <li>Increase access to quality facilities and services.</li> <li>Improve affordability and sustainability of quality facilities and services.</li> <li>Create jobs primarily for low-and moderate-income persons.</li> <li>Prioritize projects that provide a living wage and fringe benefits.</li> <li>Revitalize downtown business districts.</li> </ul>
State:  Grants from Idaho Dept. of Water Resources and Department of Environmental Quality,	\$8,858,869	<ul> <li>Improve safety and livability of communities.</li> <li>Increase access to quality facilities and services.</li> <li>Improve affordability and sustainability of quality facilities and services.</li> <li>Promote effective partnerships.</li> <li>Support efforts to increase local capacity in planning, administration, and implementation.</li> </ul>

Type/Source	Match Amount	Strategy Addressed
Federal:	¢0.705.050	Improve safety and livability of communities.
Grants from US Department of	\$9,795,859	<ul> <li>Create jobs primarily for low-and moderate- income persons.</li> </ul>
Agriculture-Rural Development		<ul> <li>Prioritize projects that provide a living wage and fringe benefits.</li> </ul>
		· Revitalize downtown business districts.
		· Improve affordability and sustainability of
		quality facilities and services.
Private:	\$99,848,524	· Create jobs primarily for low-and moderate-
		income persons.
Private Business, Foundation		· Prioritize projects that provide a living wage
Grants, Donated Services from		and fringe benefits.

Grant Administrators		<ul> <li>Improve safety and livability of communities.</li> <li>Revitalize downtown business districts.</li> <li>Improve affordability and sustainability of quality facilities and services.</li> </ul>
Total	\$154,365,183	

### **HOME**

HOME Funds are the last source of funding that go into a HOME project. IHFA and HOME believe maximum participation from the private sector, including nonprofit and profit organizations is required to make an affordable housing project successful. HOME requires a project applicant to utilize all other available sources of funding to finance a project before HOME funds are added. This leverage can include match and other eligible investments in the project, including owners' equity contributions, permanent loans provided by Idaho banks, equity investments through the low-income housing tax credit program, federal funds including grants or loans.

Leverage Source	Leverage description	Amount	Strategy Addressed
Local	Local Government	\$13,525	Sustain and increase affordable homeownership.
			Sustain and increase affordable rental housing.
			Support access to a continuum of housing services.
			Improve safety and livability of communities.
			Promote effective partnerships.
			Support efforts to increase local capacity
State	State of Idaho Health and Welfare	\$00.00	Sustain and increase affordable homeownership.
			Sustain and increase affordable rental housing.
			Improve safety and livability of communities.
Federal	United States Dept. of Agriculture Rural Development	\$2,124,528	Sustain and increase affordable homeownership.
	Internal Revenue Service Section 42 Tax Credit	\$5,124,882	Sustain and increase affordable rental housing.
	HUD's Community Development Block Grant (CDBG)	\$00.00	Support equal access to a continuum of housing services.

	HUD's Supportive Housing Program (SHP)	\$00.00	Improve safety and livability of communities.
	HUD's Self Help Opportunities Program	00.00	Promote effective partnerships.
	HUD Section 202 Grant	\$00.00	Support efforts to increase local capacity
	HUD Capitol Advantage- 811 Program	\$1,003,000	
Private	Deferred Developer Fee	\$42,143	Sustain and increase affordable homeownership.
	Donations  Conventional Financing	\$254,280	Sustain and increase affordable rental housing.
	Foundations, Grants	\$3,543,000	Support access to a continuum of housing services.
	Idaho Housing and Finance Association Private Financing	\$114,500	Improve safety and livability of
	Sweat Equity		communities.  Promote effective partnerships.
	Foregone Fees (architecture, other)	\$36,298	Support efforts to increase local capacity
	Non-For Profit Financing	\$39,810	
	Mortgage Revenue Bonds		
	Idaho Community Reinvestment Corp. (ICRC)		
	Dev/Owner Equity Cash Flow		
	TOTAL	\$13,235,000	

IHFA, Participating Jurisdiction for Idaho's HOME program, is required to provide no less than 25% non-federal match to the total HOME funds drawn for project costs. The match liability must be satisfied by the end of each federal fiscal year in which it occurs. The federal fiscal year runs from October 1-September 30. The 2007 Program Year is April 1-March 31 of each year, therefore the match contribution is estimated.

During the 2007 program year, \$5,149,564 in HOME funds was expended to various projects across the State of Idaho. The total match liability for HOME eligible expenditures from April 1, 2007 through March 31, 2008 totaled approximately \$1,039,399. This amount does not include

CHDO operating or predevelopment funds, or HOME administrative funds. The estimated match contribution was \$5,505,987.68. A summary of the contributions from private and non-Federal types is described below

	Below Market Interest Rate Loan	Foregone Fees, Taxes, Charges	Cash Non- Federal	Site Preparation, Construction	Total
Rental		\$267,028	\$298,000	\$417,363	\$982,391
First Time Homebuyer	\$4,357,204		\$168,892		\$4,526,096
TOTAL	\$4,357,204	\$267,028	\$466,892	\$417,363	\$5,508,487

## **Citizen Comment**

This section summarizes the citizen participation process IHFA and IDC followed during the CAPER process, including requests for public comment, what citizen comments were received, and how the agencies responded to those comments.

IHFA and IDC follow the HUD-approved statewide Public Participation Plan. The Plan describes minimum requirements for public/citizen participation regarding the planning, administration and reporting of federally funded programs. IHFA and IDC exceed these requirements in the interest of cultivating the investment and involvement of Idaho citizens in redistributing federal funds in their communities.

On June 4, 2008 and again on June 11, 2008, the Notice for Public Comment was published in major newspapers throughout Idaho. The Notice included where the Draft could be accessed, the comment period, and where comments should be directed. The public comment period for the 2007 Draft CAPER was June 4, 2008 through June 23, 2008. Copies of the Draft were emailed to public libraries throughout the state, including Coeur D'Alene, Boise, Nampa, Pocatello, Idaho Falls, Moscow, and Twin Falls. The Draft was available at all IHFA and IDC offices throughout the state and on the IHFA Website as a downloadable .PDF file. In addition to the newspapers and public libraries, IHFA and IDC alerted individual stakeholders of the comment period by mass email, and included cities, counties, and ICDBG-certified Grant Administrators. The CAPER Public Hearing was held June 17, 2008, 4:30-6:00 p.m. at IHFA's Boise office, 565 Myrtle Street. There were no public attendees or comments submitted during the hearing.

## **Self-Evaluation**

This section provides a self-evaluation of the CDBG and HOME programs including a comparison of proposed vs. actual outcomes of projects, whether or not all goals and strategies are being met, and, if applicable, why progress was not made towards meeting goals and objectives.

#### **CDBG**

In general, the State is making progress in meeting its identified goals for the CDBG program. This conclusion is based upon the number of project implemented and the number of persons benefiting from these projects.

During the PY 2007, 22 Idaho cities and counties were awarded CDBG funds. At least 61,891 Idaho residents will benefit from PY 2007 ICDBG program. All the projects should meet their required national objective with at least 70% of the funds benefiting low-to-moderate income persons. The 2007 funds are on track to meet the 15-month timeliness obligation requirements. Exhibit P provides an overview of the number of person expected to benefit from PY 2007 CDBG projects.

As a result of PY 2007, <u>preserve and enhance suitable living environments</u> goal was made as a result of improvements to the following number of public infrastructure systems and facilities.

- seven wastewater systems
- five water systems
- one storm water drainage system
- one fire station
- two community centers

The PY2007 funds also contributed to the goal of <u>expand economic opportunities</u> by providing funding for two communities to revitalize their downtown and four communities to fund infrastructure that provides for business growth.

The technical assistance funds provided under PY 2007 will be obligated to help meet the goal of increase community investment and involvement.

The General CAPER narrative of this report identifies where the program goals and strategies currently measures in comparison with Consolidated Plan projected investment.

#### **HOME**

IHFA's HOME program continues to strive to meet the goals set forth in the five-year Strategic Plan. IHFA continues to be a leader in, and advocate for, the affordable housing industry in the State of Idaho, and makes every attempt to continually reevaluate internal processes to help ensure the best delivery of affordable housing services as possible.

During the 2007 Program Year, HOME received 16 applications for multi-family rental activities and completed six more. This is a dramatic increase in rental activity from the previous year and included both acquisition projects as well as new construction projects. It should be noted that all acquisition activities approved were to help preserve affordable rental units in small communities that were in potentially in jeapardy of converting to market rate rentals. Because of HOME funds were used, low-income families and individuals in these communities are assured there will be affordable rental housing for years to come. As the recently approved projects make their way through the funding and development process, HOME funds will help, to not

only to sustain current affordable rental housing in Idaho's rural communities, but also significantly increase the new affordable rental housing throughout the entire state. Based on applications received during the PY2007, IHFA anticipates HOME funds will help build or maintain affordability of 450 units of rental housing in the next two to five years.

IHFA has also seen a dramatic increase in requests for single-family activities through the down-payment closing cost assistance program this year. HOME funds allowed 111 Idaho individuals or families to achieve their dream of homeownership during this past program year.

Due to a HUD monitor early in the 2007 program year, several activities previously allowed under the HOME Administrative Plan were discontinued, including the Home Of Your Own HOYO), and Pocatello's Infill program. These activities, as defined, were considered subrecipient activities, and are currently not allowed under IHFA' HOME program. The HOME homebuyer Accessibility and Rehabilitation program is currently under review. It is anticipated this program will be ready within the next year.

IHFA met two of its short-term goals by adding an Environmental Review staff person and implementing an Open NOFA process for all HOME application. The Open NOFA was implemented effective January 1, 2008. This process, while still competitive, allows developers to submit a project application according to their development timeline and not wait for a specified funding round deadline. This may be, in part why there has been a significant increase in HOME applications this past year.

All of these outcomes continue to match the goals and objectives outlined in the 2005 Five-Year Consolidated Plan. Once again, however, what does not match is IHFA's actual numerical outcomes versus the yearly numerical goals established by the Consolidated Plan (please see previous table in Affordable Housing section of the CAPER). Upon reviewing the production goals, IHFA believes the outcomes will fall short again this year for two reasons: 1) Original numerical goals were unrealistic and set too high; and 2) The HOME multifamily applications were limited to specific funding round process. While IHFA is unable to revise these unrealistic numerical goals it has, as noted above, implemented an open application process that works better with developers and their project timelines.

## **Monitoring**

This section provides an overview of the monitoring process for each program and the status of the grant programs.

#### **CDBG**

IDC monitors all CDBG funded projects to ensure compliance with applicable program rules and regulations. The IDC monitoring process starts before the actual funding of an application and continues until project closeout. This dynamic process helps to ensure projects meet program requirements and improves the chances that any violations or potential violations are identified and corrected.

*Pre-Development Monitoring:* 

Local governments who anticipate applying for CDBG funds are encouraged to contact their regional IDC specialist. IDC specialists provide recommendations and technical assistance to local governments to help them understand the CDBG program requirements. Pre-development reviews also provide IDC an understanding of the potential projects and an early assessment to determine if it will meet the CDBG goals and regulations.

## Application Monitoring:

During the review of the applications, IDC staff first determines if the application meets the required eight threshold factors, which includes national objectives and eligible activities. If the application meets the eight threshold factors, further review of the application continues to determine if the project will meet the program goals and strategies, procurement rules, acquisition and relocation requirements, citizen participation, and an assessment of the environmental review requirements. Local governments' accomplishments towards furthering fair housing and accessibility (504) standards are also reviewed.

Generally, IDC conducts a monitoring of the environmental review conducted by the local government prior to execution of the IDC contract. If the environmental review is not completed before contract execution, it is monitored prior to the release of funds.

## Project Monitoring:

IDC conducts a risk assessment of each project, utilizing the department's Determination of Onsite Monitoring criteria to establish if the project will require on-site monitoring or if the desk monitoring process will suffice. IDC monitors all CDBG funded projects and reviews the Grantee's financial audits. During the course of a project IDC, specialists are continually monitoring the following applicable project components:

-Financial Management -Procurement -Labor Standards -Acquisition & Relocation -Civil Rights -Fair Housing -Citizen Participation -504 Standards -Performance

IDC specialists approve every CDBG request for payment. Requests for payment are required to be supported by an invoice and executed contract. IDC has an established process of receiving and reviewing a local government's independent financial audit for any open project or project closed out within one year. The audit is reviewed by IDC to determine if there are any findings and if so do they affect the CDBG funds.

#### *On-Site Monitoring:*

IDC conducts an onsite monitoring of at least 25% of the CDBG funded projects for each program year. On-site monitoring consists of review of the grantee's project files, interviewing grantee staff, site observation, and exit conference.

Before closeout of a CDBG funded project, the local government chief official is required to submit a final financial and performance report. The report is reviewed by an IDC specialist for accuracy and comparable with IDC monitoring documentation.

#### **HOME**

IHFA's Compliance Department monitors initial and continuing compliance of all rental housing projects receiving funding from the HOME Program and the Low-Income Housing Tax Credit Program. Site audits of HOME projects with 1 to 4 units are performed every three years. Site audits for projects containing 5 to 25 units are performed at least once every two years. Site audits of HOME projects with more than 25 units are performed at least annually. During the 2007 Program Year, 72 HOME-Assisted developments throughout the State of Idaho were monitored for compliance. Refer to the HOME Compliance Inspection Summary in the Appendix for results of on-site inspections as well as the HOME Assessments section.

IHFA's administration of the HOME program is regularly submitted to external monitoring. HUD monitors IHFA's HOME Program every 2 years and Eide Bailly, IHFA's agency auditors, monitors every 3 years. IHFA also seeks out whenever possible, external input regarding the service and products HOME provides. During the late 2006 program year/early 2007 program year, IHFA hired a consultant, Meredith Bryant, to conduct an analysis of IHFA's HOME Program and products in comparison to other similarly structured state PJs. Ms. Bryant's final report dated May 2007 is available for viewing at <a href="http://www.ihfa.org/grants\_homeblk.asp">http://www.ihfa.org/grants\_homeblk.asp</a> under HOME Analysis Report.

In addition to external monitoring, the HOME staff reviews all HUD snapshot performance reports as they become available to check our performance and status, conducts peer reviews and updates the HOME program each fall when IHFA revises the HOME Program Administrative Plan.

Overall, IHFA's HOME Program continues to perform at a high level. As of the 3/31/08 HUD Snapshot Report (see Appendix), Idaho ranks 5<sup>th</sup> overall in the nation, moving up from 6<sup>th</sup> last year. A significant area of improvement occurred toward the end of the 2007 program year regarding HOME commitment levels. HOME staff have adjusted the procedure for conditionally committing projects earlier in the process, rather than waiting until loan closing which ranged anywhere from 6 to 12 months after project approval, causing significant delays in committing HOME funds. The HOME program will now issue conditional commitments upon application approval from IHFA's Resource Allocation Committee and enter this data into IDIS accordingly.

#### **ESG**

IHFA's Grant Department monitors recipients of the Emergency Shelter grant through an annual desk audit and risk analysis. As part of the risk analysis, continuous checkpoints are evaluated and rated from 0 to 5 (low to high risk). These checkpoints include the following factors: sponsor's record of maintaining eligible activities, requesting budget modifications, meeting statutory caps for salaries, complying with financial standards, as well as a review of equipment inventory, conflicts of interest, audit requirements, and environmental assessments. IHFA also scores several high risk factors, such as the period of time since the last on-site monitoring visit, the significance of the award, management by expenditure, grantee experience with ESG, timely reporting, complaints received, major rehab or conversion completed, past performance history, and critical staff turnover.

An onsite visit is warranted if any one factor receives a rating of five; two or more receive a rating of four; the total score of the continuous checkpoint category equals eight or more; the total score of the high risk factor category equals six or more; or the total score of all categories equals ten or more. IHFA has also developed a rating key, which deems scores of 0-2 as no risk, 3-6 low-risk, 7-9 medium-risk, and 10+ is considered high risk.

In the 2007 program year, IHFA took a one-time departure from the desk audit and risk analysis procedure to perform on-site monitoring visits of all ESG recipients, with the exception of the one new 2007 project sponsor. Compliance monitoring included a review of agency policies, financial tracking, accounting principles, and client files. After each on-site monitoring visit, IHFA notified the project sponsor of any findings and/or areas of concern as well as corrective actions required by IHFA. Project sponsors were required to respond in writing within 30 days of receiving IHFA's review. All project sponsors either have taken corrective action or are currently working with IHFA staff to correct any findings and/or areas of concern.

## **CDBG Program**

This section provides information required for the CAPER including an assessment of the relationship between program funds and the state's goals and strategies, and if there are any changes in the state's goals and strategies.

### **Assessment of Funding State Goals & Strategies**

Idaho Department of Commerce is currently meeting all but two of its 5-year strategies. The strategy of <u>creating low- and moderate-income jobs</u> and the strategy of <u>prioritizing jobs that provide a living wage and benefits</u>, are receiving less funding than our 2005 planning projections indicated. Although the department has addressed the impediments identified in the environmental process, we did not see an increase in the utilization of CDBG funds for job creation projects.

There are likely two programs and one variable that are causing the reduction of CDBG requests than was initially projected. The Idaho Legislator has continued to fund the state's Rural Community Block Grant program and the Director Job Development Fund. Both programs focus on funding public infrastructure for jobs and last year obligated approximately \$3,850,000 towards infrastructure projects. Had these funds not been available, many of those projects would have utilized the CDBG economic development funds. In addition, with the current economic conditions, the country is experiencing, banks and financial institutions are limiting the availability of credit, which is resulting in fewer business expansions and locations.

## **Changes in Program Objectives**

The State does not propose any changes to its CDBG program objectives. The State will continue to regularly refine the means or methods to achieve the goals to best meet the needs of Idaho. Any changes will be reflected in the Annual Action Plan or Consolidated Plan, if needed, via an amendment.

## **HOME Program**

This Section proves additional information required for the HOME program for the CAPER including assessment of the relationship between HOME funds and the state's goals and strategies, the HOME match report, the HOME MBE/WBE report and assessments.

#### Assessments

### Relationship of HOME Funds to Goals and Strategies

Idaho Housing and Finance Association worked diligently this past year to meet the goals set forth in the Consolidated Plan. This past year HOME funds were committed to several projects that both increased and sustained decent, affordable housing, and preserved and enhanced suitable living environments. IHFA implemented new strategies to increase community investment and involvement. This past year has reaffirmed Idaho's priority housing needs as well as an increase in the obstacles to meeting those needs as well. IHFA continues to see everincreasing demands from Idaho's underserved areas, coming at a time of increasing administrative requirements as well as less federal support and funding.

In the exhibits to the CAPER, IDIS Report C04PR23--Summary of Accomplishments, outlines the extent HOME funds were used by activity type and populations served with HOME funds by income category and race/ethnicity. Single-family activities serve persons who earn 80% Average Median Income (AMI) or less for their area. Rental activities serve the population of 0-50% AMI.

Racial Category	% of total Idaho population (1,466,465)	HOME Rental Units Completed (51)	HOME Units Rented	Hispanic/ Latino Head of Household	% of Total HOME Units by Race + Ethnicity
White	95.2%		46	1	90%
American Indian/Alaska native	1.4%		1	0	2%
Black/African American	0.7%		1	0	2%
Asian	1.1%		0	0	0%
Native Hawaiian/other Pacific Islander	0.1%		1	1	2%
Other multi-racial	1.5%		2	2	4%
Total Hispanic/Latino may be of any race,	100%	51	51	4	100%
so are also included in applicable race categories	9.5%				8%

IHFA continues to build and maintain programs that services its loans so HOME Program Income is received. This should continue to provide an additional source of revenue for the HOME program should any shortfalls occur at a federal level, or through an expansion of IHFA's HOME program. (See HOME Appendices for Match Report and MBE/WBE Report)

## **On-Site Inspections of Rental Housing**

IHFA's Compliance Department monitors initial and continuing compliance of all rental housing projects receiving funding from the HOME Program and the Low-Income Housing Tax Credit Program. Site audits of HOME projects with 1 to 4 units are performed every three years. Site audits for projects containing 5 to 25 units are performed at least once every two years. Site audits of HOME projects with more than 25 units are performed at least annually.

During the 2007 Program Year, 72 HOME-Assisted developments throughout the State of Idaho were monitored for compliance. Common areas of non-compliance encountered included, but were not limited to

- a) Inadequate and inaccurate tenant file documentation;
- b) Tenant income discrepancies;
- c) Missing tenant information;
- d) Inaccurate identification of HOME units or set-aside percentage;
- e) Violations of Housing Quality Standards including missing or inoperable smoke detectors.

Project owners/management agents are notified of areas of non-compliance and are given a reasonable period to respond and provide IHFA with all required documentation in order to maintain the project within the standards of continuous compliance.

When serious instances of non-compliance are discovered, a follow-up on-site inspection is conducted and documented. If the follow-up visit still indicated areas of concerns, another monitoring visit will be held no more than 6 months later. If continuing instances of non-compliance are discovered, the Association will be notified that an event of default has occurred and IHFA will pursue all means at its disposal to cure the default.

IHFA provides on-site training for staff of newer projects, formal classroom training at sites around the State and provides compliance manuals with standardized income certification and verification forms to project owners and property managers. The training is designed to provide property owners/managers with a thorough knowledge of the requirements of both the HOME and the Low-Income Housing Tax Credit Programs and their respective regulatory agreements.

The workshops addressed the applicable federal requirements and how they would be applicable to the applicant.

(See HOME Appendices for HOME Compliance Inspection Summary for results of on-site inspections)

#### **Affirmative Marketing Actions**

In furtherance of the State of Idaho's commitment to equal opportunity in housing, HOME requires all HOME projects to establish procedures for affirmatively marketing their housing units. The procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968 and Executive Order 11063.

An Affirmative Marketing Plan that adheres to the HOME Administrative Plan must outline the actions a project sponsor will undertake to provide information and attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex,

religion, familial status, or disability. HOME project sponsors will be required to sign an agreement to affirmatively market newly constructed or rehabilitated units beginning on the date on which all the units in the project are completed. A project Affirmative Marketing Plan must be submitted with all HOME project applications.

To help further the goals of affirmative marketing and equal opportunity in affordable housing in Idaho, IHFA provided outreach to service providers regarding the federal Limited English Proficiency (LEP) requirements in 2007. IHFA's LEP outreach included a review of the federal guidelines, LEP translation tools, directories, and approved posters for distribution.

### **Affirmative Marketing Plans**

Should include at least the following elements:

- 1. Method for informing the public, owners, and potential tenants about federal Fair Housing laws and affirmative marketing policies by:
  - a. Visiting tenants/owners in buildings selected for rehabilitation and posting signs regarding the Program in each building project. The HUD Equal Housing Opportunity logo must appear on all postings;
  - b. Using the Equal Housing Opportunity logo or slogan in press releases and other written communications used in the marketing of rehabilitated units.
- 2. Requirements and practices each owner must adhere to in order to carry out the affirmative marketing procedures and requirements, like use of commercial media, community contacts, the Equal Housing Opportunity logotype or slogan, and display of fair housing posters.
- 3. A procedure to inform and solicit applications from persons in the housing market area who are not likely to apply for the housing without special outreach using such resources as:
  - a. Advertising in the local news media.
  - b. Placing flyers in the local unemployment center, community groups, offices of the local housing authority, places of worship, fair housing groups, offices of any other local housing counseling agencies and other agencies serving low-income persons.
  - c. Notifying applicants on the local housing authority's waiting lists about upcoming vacancies.
- 4. Special outreach may be accomplished through:
  - a. Announcements in general circulation newspapers and/or ethnic; neighborhood, community, or school newspapers;
  - b. Announcements in church or school bulletins, posters, or oral presentations to community organizations;
  - c. Posters publicizing the housing placed in grocery stores, job center sites, community centers, schools, etc:
  - d. Supportive outreach assistance provided by organizations such as social service agencies, housing counseling agencies, or religious organizations; and/or;
  - e. Use of community organizations, run by minorities or, those who primarily serve minorities, such as minority churches, etc.

- 5. Project sponsors must keep records describing actions taken by the owners to affirmatively market units and records to assess the results of these actions for the duration of the HOME period of affordability concerning:
  - a. The racial, ethnic, and gender characteristics of:
    - 1. Tenants/owners occupying units;
  - b. Activities they undertake to inform the general renter public, specifically:
    - 1. Copies of advertisements placed in the news media:
    - 2. Dates on which the owner contacted other agencies;
    - 3. Dates on which the owner contacted the local housing authority;
  - c. Activities recipients undertake for special outreach; and
  - d. All applicants for tenancy.

## **Outreach to Minority and Women Owned Businesses:**

Section 3 requires that economic opportunities generated by certain HUD financial assistance (including public and Indian housing) and community development programs shall, to the greatest extent feasible, be given to low and very low income persons, particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities for these persons. This is a statutory requirement for the award of jobs and contracts generated from projects receiving HUD financing assistance. The Section 3 regulation is found at 24 CFR Part 135. It is based on Section 3 of the HUD Act of 1968. Section 3-covered contracts do not include contracts for the purchase of supplies and materials. IHFA continued its efforts to promote Section 3 opportunities in the 2006 Program Year; however, due to demographics in Idaho, minority and women owned businesses continue to be hard to find.

## **Emergency Shelter Grants Program**

This section provides a complete overview of the Emergency Shelter Grants(ESG) program including its relation to the state's goal and objectives, how the program funds are matched, the state's method of distribution, any activity and beneficiary data, the state's policy for homeless discharge coordination

#### **Assessments**

### Relationship of ESG to Goals and Objectives

Recipients of ESG funds are required to participate in regional homeless coalition meetings. This enables coalition members and ESG project sponsors to collaborate and address specific homeless needs within the community. The homeless subpopulations served by ESG funds are outlined in chart #1 on page 19.

IHFA has continued to make progress in addressing homeless and homeless prevention needs, goals, and objectives as established in the consolidation plan. In this program year, IHFA allocated \$90,000 in IHFA private revenues and \$54,000 in ESG funds to assist persons at imminent risk of homelessness. Homeless prevention funds are administered through IHFA branch offices and ESG project sponsors.

ESG funds are also used to address the needs of the chronically homeless. IHFA has encouraged project sponsors to increase their capacity to serve the chronically homeless. In order to receive maximum funding, at least 40% of the individuals served by a project sponsor must be chronically homeless.

As noted in the Continuum of Care section, ESG funds have successfully facilitated individuals in making the transition from homelessness to transitional and permanent housing.

#### **Matching Resources**

ESG project sponsors are required to provide documentation for matching funds in the Annual Performance Report submitted to IHFA. As HUD waives the first \$100,000 of the dollar-fordollar ESG match requirement, IHFA is required to demonstrate matching resources of \$418,733 for the 2006 ESG grant and \$425,763 for the 2007 ESG grant. In order to fulfill this requirement, IHFA requires that each sponsor submit 81% in match documentation for their ESG award. In the 2006 APR, project sponsors submitted the entire \$418,733 required as match. Additional match for the 2006 ESG award was submitted in the 2007 APR by sponsors in order to reach their individual 81% requirement. In the 2007 APR, sponsors submitted \$629,541 as match documentation for their 2007 ESG awards, exceeding the minimum required match by over \$200,000.

Match Submitted in 2006 APR	2006 ESG	2007 ESG
Federal/State Grants	\$872	\$16,469
Private/Community Funds	\$74,775	\$442,969
In-kind Donations	\$23,059	\$170,103
Total Match	\$98,706	\$629,541

#### **State Method of Distribution**

IHFA's Emergency Shelter Grants are chosen through a competitive statewide application process. This process includes the following elements:

- 1) Funding availability is announced in Idaho newspapers in each region of the state soliciting project applications from interested state or local governments and non-profit organizations.
- 2) In 2007, 21 applications were accepted and reviewed by an Independent Review Panel. Persons with experience in issues related to homelessness were recruited to serve as reviewers responsible for rating applications using criteria provided by IHFA.
- 3) Members of the Independent Review Panel scored each proposal individually before meeting to reconcile and average the scores. The resulting averaged score reflected the Panel's collective determination of merit. All applications meeting a threshold score determined by a weighted average were funded. The following includes a summary of the six vital areas that serve as the basis for funding approval:
  - a. Agency background, including history of service and population served

- b. Emergency shelter needs and/or the service deficiency the project addresses
- c. Identify independent elements and/or services requiring funding
- d. Goals and objectives and how they would be achieved
- e. Outcome measurements and documentation of accomplishments
- f. Statement describing applicant's capacity to administer the award

From the rating process, nineteen (19) agencies were awarded conditional funding to provide both shelter and homeless prevention activities in their respective regions of the state.

All applicants were evaluated on their threshold score. For these qualified applicants, we then required documentation regarding the following functional areas in the technical submission:

Grant budget
Homeless Participation and representation on the Board of Directors
Insurance coverage
Matching funds
Local government certifications
Accounting certifications
Various assurances
Various authorizations
Facility description and capacities

Upon making final awards, grant contracts were provided with instructions, policies, and procedures for implementing the Emergency Shelter Grant.

ESG works on a reimbursement basis. Project sponsors mail Request for Funds forms to IHFA monthly or bi-monthly. Expenditure receipts must be attached to the Request for Funds, documenting eligible grant activities performed by the agency within a 60-day period. IHFA monitors grant spending until all awarded funds are depleted for each contracted agency. Contracts are in effect for 18 months. IHFA submits activity reports representing twelve months out of the eighteen-month contract period.

The ESG funds allocated to the 19 non-profit agencies provided emergency shelter, short-term transitional housing, homeless prevention programs (including rental and utility assistance), as well as direct client services such as food, transportation, counseling, child care, legal services, clothing, medical services, and case management. The allocation percentages by region are found in the following tables:

**2007 Funding Allocations** 

Region	Percent of Allocation	Amount Awarded in 2007 Application Process
1	8.4%	\$44,348
2	11.1%	\$58,418
3	12.3%	\$64,676
4	13.3%	\$69,695

5	18.1%	\$95,344
6	18.7%	\$98,095
7	13.1%	\$68,899
Admin	5%	\$26,288
Total	100%	\$525,763

# 2007 Beneficiary Data

Race/Ethnicity of Families & Persons Assisted Under the ESG Program April 1, 2007 - March 31, 2008				
American Indian/Alaskan Native	124	4.13%		
American Indian/Alaskan Native & White	25	.83%		
Asian	10	.33%		
Asian & White	4	.13%		
Black/African American	83	2.77%		
Black/African American & White	19	.63%		
Native Hawaiian or Other Pacific Islander	10	.33%		
Other Multi-Racial	297	9.90%		
White	2,430	80.95%		
Total	3002	100%		
Hispanic/Latino Clients	556	18.5%		

Income Levels of Families & Persons Assisted under the ESG Program						
A	April 1, 2007 - March 31, 2008					
Monthly Income	Families/Individuals	Percentage				
	Assisted					
\$0-\$199	832	47.6%				
\$200-\$399	102	5.9%				
\$400-\$599	154	8.8%				
\$600-\$799	185	10.6%				
\$800-\$999	140	8.0%				
\$1,000-\$1,199	143	8.2%				
\$1,200-\$1,399	67	3.9%				
\$1,400-\$1,599	49	2.80%				
\$1,600-\$1,799	30	1.7%				
\$1,800-\$1,999	11	.6%				
\$2,000-\$2,199	15	.9%				

\$2,200-\$2,399	4	.2%
\$2,400-\$2,599	8	.5%
\$2,600-\$2,799	3	.2%
\$2,800-\$2,999	0	0%
\$3,000-\$3,199	2	.1%

**ESG** Expenditures by Activity

		ESG Expen	ditures by Acti	vity		
Sub-grantee	Admin	Rehab. /	Operations	Homeless	Essential	Total
		Renovation		Prevention	Services	Expenditures
The Advocates			\$17,389.03	\$1,224.00	\$5,067.29	\$23,680.32
Aid for Friends			\$13,691.00	\$0.00	\$13,003.82	\$26,694.82
Alternatives to Violence			\$14,729.75	\$0.00	\$10,145.11	\$24,874.86
Bannock Youth			\$26,274.21	\$0.00	\$7,000.00	\$33,274.21
Foundation						
Bonner County				\$1,385.00		
Homeless Task Force						
City of Refuge			\$25,284.51	\$0.00	\$15,148.79	\$44,979.23
CLUB			\$18,320.68		\$8,524.41	\$26,845.09
Crisis Center of the			\$28,126.75	\$0.00	\$5,991.92	\$34,118.67
Magic Valley						
FAITH			\$11,730.96	\$0.00	\$4,800.00	\$16,530.96
Jesse Tree			\$0.00	\$15,660.00	\$0.00	\$15,660.00
Mahoney House			\$9,772.58	\$0.00	\$4,990.31	\$14,762.89
Oneida Crisis Center		\$10,192.87	\$2,686.79		\$3,103.34	\$15,983.00
SA-Boise			\$13,879.16	\$0.00	\$2,330.00	\$16,209.16
SA-Nampa			\$15,506.32	\$0.00	\$2,864.42	\$18,370.74
The Sanctuary			\$26,240.00	\$0.00	\$0.00	\$26,240.00
SEICAA			\$0.00	\$8,100.00	\$0.00	\$8,100.00
SCCAP			\$0.00	\$9,825.68	\$0.00	\$9,825.68
St. Vincent de Paul			\$25,182.91	\$9201.89	\$12,421.00	\$46,805.80
Supportive Housing and			\$13,581.62	\$0.00	\$5,828.21	\$19,409.83
Innovative Partnerships						
Valley Crisis Center			\$21,507.76	\$17,283.23	\$10,992.70	\$49,783.69
YWCA			\$27,302.29			\$32,881.35
		_			\$5,579.06	
IHFA	\$26,124.83		\$0.00	\$0.00	\$0.00	\$26,124.83
Total	\$26,124.83	10,192.87	\$311,622.87	\$62,679.80	\$117,373.83	\$532.540.13

## **Homeless Discharge Coordination**

Project sponsors of the Emergency Shelter Grant are required to comply with the state's policy regarding homeless discharge planning and coordination. Formal protocol and coordination have

been implemented for individuals being discharged from public institutions and systems of foster care, health care, mental health, and corrections.

ESG funds may be used to assist persons being discharged from public institutions only when:

- a) the person has been institutionalized *more* than 30 days and the person has no available resources for housing upon discharge; **OR**
- b) the person has been institutionalized *less* than 30 days and the person was homeless according to the published definition prior to institutionalization; **AND**
- c) the persons can demonstrate, according to the standards of this Protocol that no resources were available upon release or they were homeless prior to institutionalization.

Persons discharged from publicly run institutions that request housing or services from a homeless program funded with ESG funds must provide the following documentation:

- 1) Written documentation from the institutions governing agency (such as Mental Health, Corrections, Foster Care) stating discharge of the person is necessary and no available resources and/or support networks exist to help them obtain housing; OR
- 2) Written documentation from the institution's governing agency (such as Mental Health, Corrections, Foster Care) stating the person was homeless according to the published homeless definition prior to institutionalization; AND
- 3) Written documentation must contain specific information about who verified the status of the individual, what mainstream resources, and community networks were contacted, when benefits from those resources were denied, and the name of the person (including their organization) that denied the benefits.